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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

INDUSTRIAL TECHNOLOGY RESEARCH INSTITUTE,

Plaintiff,

VS.

LG ELECTRONICS, INC.,
LG ELECTRONICS U.S.A., INC.
and LG ELECTRONICS MOBILECOMM
U.S.A., INC.,

Defendants.

Case No. 3:14-cv-02834-H-RBB

Hon. Marilyn L. Huff
Hon. Ruben B. Brooks

JOINT MOTION TO DISMISS

1 Plaintiff and Counterclaim Defendant Industrial Technology Research Institute
2 (“ITRI”) and Defendants and Counterclaim Plaintiffs LG Electronics, Inc., LG
3 Electronics U.S.A., Inc., and LG Electronics MobileComm U.S.A., Inc. (collectively,
4 “LG”) have settled all claims and counterclaims against each other. Accordingly,
5 pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, LG and ITRI hereby
6 jointly move the Court to dismiss all claims by ITRI against LG with prejudice and all
7 counterclaims by LG against ITRI with prejudice. The parties agree that,
8 notwithstanding the foregoing, in the event that any of the patents-in-suit are asserted
9 against LG again in the future, LG may file claims for declaratory judgment of
10 invalidity and non-infringement of those asserted claims. Each party further agrees to
11 bear its own costs, expenses, and attorneys’ fees.
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13 LG and ITRI agree to this joint motion.
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1 Dated: August 25, 2015

By: /s/ Alfonso Garcia Chan

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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2015, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Jeffrey K. Sherwood
Jeffrey K. Sherwood